

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
V.)	CR. No.: 2:11cr209-WKW
)	
ROBERT JERRELL BONNER)	

DEFENDANT'S MOTION FOR RELEASE

COMES NOW the Defendant, **ROBERT BONNER**, by undersigned counsel, and respectfully moves this Court to order the release of the Defendant from custody, on the conditions previously set by this Court.

In support of this Motion, the Defendant would show:

1. Mr. Bonner was initially arrested on this Indictment on December 20, 2011 (Docket).
2. At the time of his arrest, he was arraigned and released on an unsecured bond.
3. On February 29, 2012, at the direction of his pretrial officer, Mr. Bonner began the Intensive Outpatient Program at the Chemical Addictions Program
4. In March 2012, the Government filed a Motion for Mental Evaluation (Doc. 24, sealed).
5. On March 26, 2012, the U.S. Probation office filed a Motion to Revoke Bond and Motion to Seal, alleging using of cocaine by Mr. Bonner. This Court directed the issuance of a warrant regarding this Petition. (Doc. 30). However, no ruling has been entered on this Motion.
6. On March 27, 2012, the Court held a hearing on the Government's Motion for Mental Evaluation and directed that the United States Marshal Service take Mr. Bonner into custody and deliver him to an appropriate facility for that evaluation. (Doc. 33).
7. The report of the evaluation was received by the Court on July 9, 2012 (Doc. 44,

sealed) and Mr. Bonner was subsequently returned to custody in this district.

8. On August 6, 2012, Mr. Bonner's counsel notified the Court, by Motion to cancel the competency hearing, that he did not contest the finding that he is competent to stand trial.

9. As of the date of this Motion, Mr. Bonner has been in custody four months and two weeks. He has presumably been drug-free that entire time. He is willing to continue attending appropriate drug-treatment programs, as necessary and directed by the pretrial probation officer. He continues to have a home available to him, in Montgomery, with his mother.

10. A pretrial conference is scheduled on August 20, 2012 (Doc. 40). Trial is set for October 1, 2012 (Docket, May 15, 2012). The parties have engaged in negotiation and are discussing resolution of this case.

WHEREFORE, Mr. Bonner requests that this Motion be granted and that he be released from custody on the conditions for release previously ordered.

Respectfully submitted,

s/Christine A. Freeman
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CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Brent Woodall, Esquire
Assistant United States Attorney
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Respectfully submitted,

s/Christine A. Freeman
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